

### **REMARKS**

Applicants have now had an opportunity to carefully consider the Examiner's comments set forth in the Office Action of January 27, 2005.

Reconsideration of the Application is requested.

### **The Office Action**

Drawings are objected to under 37 CFR §1.83(a) stating that the drawings must show every feature of the invention specified in the claims.

Claims 1-5, 12-19, 28-30 and 38-39 stand rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to point out and distinctly claim the subject matter which applicants regard as the invention.

Claims 1-19 and 38-39 stand rejected under 35 U.S.C. §103(a) as being unpatentable over H.A.M. Van Oijen (U.S. Patent No. 5,918,988 and Wanda ('881)).

Claims 20 – 27 and 28 – 33 stand rejected under 35 U.S.C. §103(a) as being unpatentable over H.A.M. Van Oijen in view of Harrington III et al. (U.S. Patent No. 6,166,822).

Claim 34 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Joslin et al. (U.S. Patent No. 6,272,483 B1) and Beach et al. (U.S. Patent No. 3,831,197).

Claims 35 – 37 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Joslin, Beach et al. '197 and Gregory (Newsgroups: news.answers, sci.answers, sci.op-research).

### **COMMENTS/ARGUMENTS**

**Claims 4, 21-23, 25-27, 29, 30 and 32-37 have been Canceled**

### **The Non-Art Rejections**

The rejections under 35 U.S.C. 112, second paragraph are hereby respectfully traversed and/or obviated.

With attention to claims 1, 12, 16 and 38, it is noted the Office Action stated the language, "cell consisting of a logical grouping of resources" was indefinite due to language at page 2, lines 12-18, which the Examiner points to as defining the cell

as including a physical device.

We respectfully direct attention to page 5 of the application, beginning on line 15, wherein it is stated that "each cell is a logical grouping of resources (including both equipment and manpower) in the document factory that is sufficient for completing at least one type of document processing job."

It is to be appreciated, that in view of this, claims 1, 12, 16 and 38 are deemed to be appropriate. Particularly, it is to be noted that while there are physical devices such as a printer, binder, copier, collator and/or a shrink wrapper in an autonomous cell, they are logically grouped to generate a full printshop production. For example, one autonomous cell may include a printer, a collator and a binder. Therefore, the logical grouping of the resources permit for the printing of the document, collating the document copies, and then binding the individual documents. This, again, is distinct from existing printshop concepts.

Applicants have also amended the claims where deemed appropriate for further clarification.

The objections to claim 28 have also been addressed.

### **The Art Rejections**

Claims 1-19 and 38-39 stand rejected under 35 U.S.C. 103(a) as being unpatentable over H.A.M. Van Oijen (U.S. Patent No. 5,918,988 and Wanda ('881)). This position is hereby respectfully traversed. The cited references do not teach or fairly suggest the claim limitations set forth in these claims of the present application.

Initially, Applicants note that paragraph 6 of the Office Action states Wanda ('881) teaches autonomous cells. However, Wanda does not teach or fairly disclose an autonomous cell which includes a logical grouping of resources, representing physical devices, sufficient for completing at least one type of document processing job. Rather, this patent is directed to continuously printing in a specified order by one operation, even if a plurality of host computers are accessing a single printer. The cell described in Wanda is simply a location for writing data. In view of the above discussion, where it is explicitly noted that cells include physical devices having specific printing capabilities, it can be seen that the analogy of autonomous cells to Wanda is inappropriate.

To further emphasize this distinction, Applicants have added dependent claims which specifically call out various physical devices which are in the autonomous cells, as specified in the present application. For example, on page 11, it is noted that an autonomous cell may include a printer, a coil binder, and a shrink wrapper.

Thus, for at least these above reasons, it is submitted the various independent claims associated with these arguments are distinguished from the cited art.

Further, the present application includes a bidding process whereby jobs are provided to each of the autonomous cells in accordance with a low bid. Applicants, again, believe this is not taught or fairly shown by any of the cited art. Applicants have also added new claims to provide more detail as to the generation of bids, which is not taught or suggested in the cited art.

Finally, applicants restate the arguments regarding independent claims 20, 24 and 28 and request the Examiner to reconsider his position.

For at least these reasons, it is submitted the remaining claims in the application are now in condition for allowance. An early notice to that effect is therefore earnestly solicited.

**CONCLUSION**

For the reasons detailed above, it is submitted all claims remaining in the application (Claims 1-20, 24, 28, 31, 38-49) are now in condition for allowance. The foregoing comments do not require unnecessary additional search or examination.

In the event the Examiner considers personal contact advantageous to the disposition of this case, he/she is hereby authorized to call Mark S. Svat, at Telephone Number (216) 861-5582.

Respectfully submitted,

FAY, SHARPE, FAGAN,  
MINNICH & McKEE, LLP

7/24/05  
Date

Mark S. Svat  
Mark S. Svat  
Reg. No. 34,261  
1100 Superior Avenue, 7<sup>th</sup> Floor  
Cleveland, Ohio 44114-2579  
(216) 861-5582

N:\XERZ\200557\JRC0000055V001.DOC